IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

CLEARWATER INSURANCE COMPANY and EVEREST REINSURANCE COMPANY

Plaintiffs,

v.

THE DOE RUN RESOURCES COMPANY f/k/a ST. JOE MINERALS CORPORATION,

Defendant.

No.: 4:16-cv-00195 HEA

JURY TRIAL REQUESTED

PLAINTIFFS' MOTION FOR ADDITIONAL TIME TO RESPOND TO DEFENDANT THE DOE RUN RESOURCES COMPANY'S MOTION TO DISMISS

NOW COMES Plaintiffs Clearwater Insurance Company and Everest Reinsurance Company ("Plaintiffs"), and hereby requests that this Court grant an extension of time, up to and including May 11, 2016, to file their response to Defendant The Doe Run Resource Company's ("Doe Run") Motion to Dismiss and in support thereof state as follows:

1. Doe Run filed its Motion to Dismiss on or about April 20, 2016 which included several arguments related to jurisdictional issues.

2. Pursuant to Local Rule 7-4.01, Plaintiffs' response to Doe Run's Motion to Dismiss is presently due April 27, 2016.

3. Pursuant to Federal Rules of Civil Procedure Rule 6(b) and to Local Rule 6-1.05, the Court may extend, either with or without motion, the time that a party has to respond to a motion for good cause provided that the request is made before the original time in which to respond has expired.

4. Plaintiffs request a fourteen-day extension to permit Plaintiffs time to properly research and analyze the legal issues raised by Doe Run in its Motion to Dismiss.

5. Due to the demands of this case as well as others, Plaintiffs' counsel needs the requested extension to prepare and finalize Plaintiffs' response to Doe Run's Motion to Dismiss.

6. The extension requested in this motion is not vexatious in nature, is being made in good faith, and will not cause unnecessary delay.

7. No previous extensions with respect to Plaintiffs' response to Doe Run's Motion to Dismiss have been requested by Plaintiffs.

8. On April 21, 2016, counsel for Plaintiffs contacted counsel for Doe Run by phone and by email to request Doe Run's consent to a fourteen-day extension of time to respond to Doe Run's Motion to Dismiss.

9. Doe Run has not consented to this extension of time.

WHEREFORE, Plaintiffs Clearwater Insurance and Everest Reinsurance respectfully request that this Court grant their motion for extension of time to respond to Doe Run's Motion to Dismiss up to and including May 11, 2016.

Respectfully submitted,

/s/ Michael M. Perich

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Attorneys for Plaintiffs Clearwater Insurance Company and Everest Reinsurance Company

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2016, the foregoing was filed electronically with the Clerk of the Court to be served on the following by operation of the Court's electronic filing system:

Marc D. Halpern mhalpern@abelsonherron.com
Attorney for Defendant

/s/ Michael Perich